

## **REMARKS**

### *Rejections Relying on 35 U.S.C. § 102(e)*

Applicant notes that references used in support of the rejections rely on 35 U.S.C. § 102(e), either directly or through 35 U.S.C. § 103(a). In responding to the rejections, Applicant does not admit that the references are prior art and Applicant specifically reserves the right to swear behind these references at a future date. However, Applicant contends that the claims are patentably distinct from the cited references.

### *Claim Rejections Under 35 U.S.C. § 102*

Claims 1-2, 5-6, 47, 49, 51, 53, 62-66 and 69 were rejected under 35 U.S.C. § 102(e) as being anticipated by Hsu et al. (U.S. Patent No. 6,128,700).

Claim 1 is amended herein to include the limitations of claim 3, which the Examiner has indicated as being allowable. Applicant thus respectfully submits that claim 1 is allowable.

Claim 47 recites, in part, “at least one control signal line for receiving decoded control signals from the external device to control operations on the memory array,” “wherein the memory device is devoid of logic functions capable of command interpretation.” The Office Action asserts, “[F]igure 2 of Hsu et al disclose a memory device comprising a memory array (214), at least one control signal line (CONTROL) for receiving a decoded control signal (the signal from 211 is a decode signal) from the external device (220). Office Action, page 3, paragraph 4. Regardless of whether the signal from Hsu et al.’s system logic cache and DRAM controller 211 is a decoded signal, which Applicant denies, there is no teaching or suggestion that Hsu et al.’s main memory 214 is devoid of logic functions capable of command interpretation. Applicant notes that typical memory devices include control and logic functions for the interpretation of commands from an external device. Specification, paragraph 0010. As Hsu et al. does not describe that its main memory 214 is devoid of logic functions capable of command interpretation, Applicant contends that the Examiner is taking official notice of facts outside of the record. In accordance with MPEP § 2144.03, Applicant respectfully requests that the Examiner provide a reference or convincing line of reasoning supporting the assertion that the main memory 214 of Hsu et al. is devoid of logic functions capable of command

interpretation. Absent such a reference or line of reasoning, Applicant contends that the Examiner cannot rely on this statement in support of any rejection of claim 47. Applicant thus respectfully submits that claim 47 is patentably distinct from the cited reference.

Claim 51 recites, in part, “at least one address signal line for receiving decoded address signals from the external device” and “access circuitry to provide access to the memory array in response to the decoded address signals,” “wherein the memory device is devoid of logic functions capable of address decoding.” For similar reasoning with respect to claim 47, Applicant contends that the Examiner is taking official notice of facts outside of the record that Hsu et al.’s main memory 214 is devoid of logic functions capable of address decoding. In accordance with MPEP § 2144.03, Applicant respectfully requests that the Examiner provide a reference or convincing line of reasoning supporting the assertion that the main memory 214 of Hsu et al. is devoid of logic functions capable of address decoding. Absent such a reference or line of reasoning, Applicant contends that the Examiner cannot rely on this statement in support of any rejection of claim 51. Applicant thus respectfully submits that claim 51 is patentably distinct from the cited reference.

Claim 62 recites, in part, “wherein at least one control signal line, address signal line or data signal line is substantially incapable of level translation.” The Office Action asserts, “[T]he address signal line, the data signal line and the control signal line of Hsu et al is substantially incapable of level translation.” Office Action, page 4, first paragraph. Applicant has taught that level translation is normally included in a memory device to protect the device from voltage levels of a system bus and to drive the voltage and load levels of an external system bus. Specification, paragraph 0028. As Hsu et al. does not describe that its control signal lines, address signal lines or data signal lines are substantially incapable of level translation, Applicant contends that the Examiner is taking official notice of facts outside of the record. In accordance with MPEP § 2144.03, Applicant respectfully requests that the Examiner provide a reference or convincing line of reasoning supporting the assertion that the control signal lines, address signal lines or data signal lines of Hsu et al. are substantially incapable of level translation. Absent such a reference or line of reasoning, Applicant contends that the Examiner cannot rely on this statement in support of any rejection of claim 62. Applicant thus respectfully submits that claim 62 is patentably distinct from the cited reference.

Claim 66 as amended recites, in part, “wherein at least one control signal line, address signal line or data signal line is a nominally-buffered signal line.” Applicant has defined a nominally-buffered signal line as being substantially incapable of level translation and may further be non-buffered. Specification, paragraph 0015. As noted with respect to claim 62, Applicant contends that the cited reference fails to teach or suggest at least this limitation of claim 66. Applicant thus respectfully submits that claim 62 is patentably distinct from the cited reference.

Claim 69 depends from claim 67, which the Examiner has indicated as being allowable. As the rejection only addresses the limitations of the dependency, Applicant presumes that the rejection is in error and that claim 69 is allowable as depending from claim 67.

In view of the foregoing, Applicant respectfully submits that independent claims 1, 47, 51, 62 and 66 are patentably distinct from the cited reference. As claims 2 and 5-6 depend from and further define patentably distinct claim 1, claim 49 depends from and further defines patentably distinct claim 47, claim 53 depends from and further defines patentably distinct claim 51, claims 63-65 depend from and further define patentably distinct claim 62, and claim 69 depends from and further defines patentably distinct claim 67, these claims are also believed to be allowable. Applicant thus respectfully requests reconsideration and withdrawal of the rejections under 35 U.S.C. § 102(e), and allowance of claims 1-2, 5-6, 47, 49, 51, 53, 62-66 and 69.

*Claim Rejections Under 35 U.S.C. § 103*

Claims 50, 54, 70 and 71 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hsu et al. in view of Wendall et al. (U.S. Patent No. 5,930,185).

Applicant contends that it has shown claims 47 and 51 to be patentably distinct over the primary reference of Hsu et al. The secondary reference of Wendall et al. fails to overcome the deficiencies of the primary reference with respect to claims 47 and 51. Applicant further notes that claim 67 was indicated as being allowable by the Examiner. As such, Applicant contends that claims 47, 51 and 67 are patentably distinct from the cited references, either alone or in combination. As claim 50 depends from and further defines patentably distinct claim 47, claim 54 depends from and further defines patentably distinct claim 51, and claims 70 and 71 depend

from and further define patentably distinct claim 67, these claims are also believed to be allowable. Applicant thus respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a), and allowance of claims 50, 54, 70 and 71.

*Allowable Subject Matter*

Claims 3-4, 48, 52, 72-73 were objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form, including all of the limitations of the base claim and any intervening claims. Applicant has canceled claim 3 in view of the amendment to its base claim 1 and amended claim 4 to depend from claim 1. Applicant contends that it has shown independent claims 1, 47 and 51 to be patentably distinct from the cited references, and notes that claim 67 has been indicated as being allowable. As claim 4 depends from and further defines patentably distinct claim 1, claim 48 depends from and further defines patentably distinct claim 47, claim 52 depends from and further defines patentably distinct claim 51 and claims 72-73 depend from and further define patentably distinct claim 67, these claims are allowable in their present form. Applicant thus respectfully requests reconsideration and withdrawal of the objection, and allowance of claims 4, 48, 52, 72-73.

Applicant acknowledges that claims 29-30, 35-46, 55-61, 67-68 and 74-86 were indicated as being allowed.

*Withdrawn Claims*

Claims 7-28 and 31-34 were withdrawn from consideration, but Applicant reserved the right to have these withdrawn claims examined as provided by 37 CFR § 1.141 if a generic claim were shown to be allowable. Applicant contends that with the amendments to claims 7 and 23 entered herein, patentably distinct claim 1 is generic to claims 7 and 23. Applicant further notes that claim 1 is generic to claims 9-16 as these claims depend from and further define claim 7, and that claim 1 is generic to claims 24-28 as these claims depend from and further define claim 23. Applicant further notes that allowed claim 29 is generic to claims 17 and 31, and also to their dependent claims 18-22 and 32-34, respectively. As such, Applicant contends that it is entitled to examination of previously withdrawn claims 7, 9-28 and 31-34, and that these claims are allowable as each contains all of the limitations of an allowable elected claim 1 or 29.

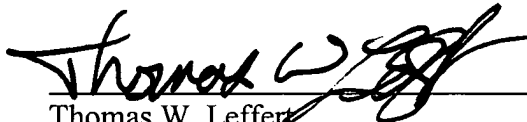
**CONCLUSION**

Claims 1, 4, 7, 9, 23 and 66 are amended herein. Claims 3 and 8 are canceled hereby in view of amendments to claims 1 and 7, respectively. Claims 1-2, 4-6, 29-30 and 35-86 are currently pending. Applicant has further requested that withdrawn claims 7, 9-28 and 31-34 be reinstated for examination.

In view of the above remarks, Applicant believes that all pending claims are in condition for allowance and respectfully requests a Notice of Allowance be issued in this case for claims 1-2, 4-7, and 9-86. If the Examiner has any questions or concerns regarding this application, please contact the undersigned at (612) 312-2204.

Respectfully submitted,

Date: 18 JAN 06

  
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